

NR 411 Indirect Source Rule Revisions
Draft Stakeholder Session Summary
Heavy Duty Diesel
July 27, 2006

Attendees: Mark Bentley, Scott Manley, Pat Stevens, Stephanie Hickman, Bob Moreau, Pat Trainer, Carolyn Amegashie, Larry Bruss, Mike Halstead, Mike Friedlander,

Item: Purpose of Meeting (Bruss)

Keypoints:

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| <ul style="list-style-type: none">• Obtain stakeholder input on heavy-duty diesel provisions of the proposed rule change• Stakeholders request clear explanation of targeted emissions by rule change |
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Outcomes/Follow-up:

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| <ul style="list-style-type: none">✓ WDNR will provide emissions reduction information for Air Toxics, Particulate Matter, Volatile Organic Compounds, and Nitrogen Oxides for 2009 and 2012 |
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Item: Proposed Permit Criteria (Bruss)

Keypoints:

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| <ul style="list-style-type: none">• Stakeholder seek clarification on how proposed 50 truck trip criteria applies to the following situations:
Asphalt Plants and Construction Sites• Stakeholders request clarification on facility definition, are new manufacturing sites included? Average vs. peak period traffic? Incremental Growth Provisions? Will new Highway Rest Stops and Bus Terminals be affected by proposed rule? |
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Outcomes/Follow-up:

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| <ul style="list-style-type: none">✓ WDNR explains that criteria are expected to be based on average daily traffic trips. Intent to focus on permanent sites where potential health based receptors will have prolonged exposure. Proposed rule will not apply to Heavy Duty Diesel Trucks that idle on exit/entrance ramps✓ WDNR actively seeking stakeholder input on exemptions for rule such as refrigerated trailers and Trucks equipped with Auxiliary Power Units |
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Item: Air Quality Benefits Discussion (Friedlander) Idle Restriction
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Keypoints:

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| <ul style="list-style-type: none">• Updated Distribution Center List compiled from WisDOT and Department of Commerce• Proposed criteria for permit is 50 truck trip average per day• Air Quality Estimation based on Distribution Centers with more than 40,000 square feet at 5 Average Trip Generation per 1,000 Square feet Gross Floor Area, 200 average trips (Institute of Transportation Engineers – 7th Edition)• Currently 101 Distribution Centers in Wisconsin with more than 40,000 square feet• Forecasted Annual growth in Distribution Centers estimated to be 3.5%, or the annual increase in vehicle miles traveled for Heavy Duty Diesel Vehicles. Potential new facilities to be permitted is rounded down to 3 per year• Truck idle emission factors for the year 2009 are:
For NOx: 37.5 grams per hour vs. 1.875 grams for 3 minute idle
For PM2.5: 1.08 grams per hour vs. 0.054 grams for 3 minute idle
100 Trucks X 37.5 NOx grams/hr X 365 days / 454 grams / 2000 pounds = 1.5 Tons Nox
100 Trucks X 1.875 NOx grams/hr X 365 days / 454 grams / 2000 pounds = 0.075 Tons Nox |
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1.45 Ton reduction in NOx per permitted facility X 3 annual facilities = **4.35 Ton Annual Benefit**

Item: Air Quality Benefits Discussion – Continued (Friedlander) Low-NOx Chip Reflash

Keypoints:

- The percentage of heavy-duty trucks during CY 2009 which are of model year 1993-1998 is **19%**, according to the MOBILE6 default distribution. (Trucks presumed to require Low-NOx chip reflash)
- 40,000 square foot Distribution Center with 200 average daily truck trips will have 50 trucks owned by Distribution center
- 50 Trucks X 0.19 trucks = 9.5 trucks in MY 1993-98
- 9.5 Trucks X .22 Annual Tons NOx Reduced through Low NOx Chip Reflash = 2.09 Tons of NOx
- 2.09 Ton reduction in NOx per permitted facility x 3 annual facilities = **6.27 Ton Annual Benefit**

* WisDOT estimates that 15,000 facilities exist that meet proposed criteria of Distribution Centers with more than 10,000 square feet or 50 average daily truck trips. Efforts underway to refine existing Distribution Center data

Outcomes/Follow-up:

- ✓ WDNR will produce emissions inventory information associated from Heavy Duty Diesel Trucks for 2009 and 2012.
- ✓ Mark Bentley working with USEPA and Trucking Association to survey members on best management practices. Mark Bentley will share preliminary draft with WDNR before mailing

Item: General Discussion (Group)

Keypoints:

- Scott Manley and Pat Stevens request that WDNR provide clear rationale for Legal Authority to pursue mobile source control measures proposed in NR 411 revision
- Bob Moreau comments on perceived common thread of agreement on proposed measures. Recommends that we prioritize potential Air Quality sources on significance of contribution and that final rule package should be fair, simple, and enforceable

Outcomes/Follow-up:

- ✓ WDNR will confer with Legal staff to consider request
- ✓ WDNR will work with Bob Moreau to present inventory data based on contribution that is within the scope of NR 411

Item: Next Steps - Administrative

Keypoints:

- To improve stakeholder process, WDNR commits to the following:
 - Each Meeting will be preceded by Objective Statement
 - Each Meeting will have a list of Issues for Consideration
 - Background Material will be mailed at least one week in advance of scheduled meeting
 - Each Meeting will identify next steps and a schedule of event

NEXT MEETING: Thursday, September 14, 9:30-Noon in Room 717

TOPIC: Off Road Construction/ Transportation Sector